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June 8, 2022

Via ECF

Hon. Paul G. Gardephe, United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: USA v. Pierre (Andrew Prime)
22-Cr-19 (PGG)

Dear Judge Gardephe:

I represent Mr. Prime in the above Matter. I am submitting this letter as a follow-up to my letter motion of yesterday, requesting a temporary bail modification for Mr. Prime. I have reviewed my emails, and the email I sent to Pre-Trial Services last week referenced Mr. Prime's docket number, but I inadvertently did not include the text requesting the bail modification. I apologize to the Court and to Pre-Trial for any inconvenience this may have caused. Pre-Trial has no objection to the request, and the Government has taken no position.

Accordingly, I am respectfully renewing my request for a temporary modification of Mr. Prime's bail conditions to allow him to travel to Los Angeles California tomorrow, returning on or before June 20, 2022.

Thank you for your consideration in this matter.

Very truly yours,


David K. Bertan

DKB

cc: AUSAs Mathew Andrews and Louis Pellegrino (via ECF)

MEMO ENDORSED

The Application is granted.

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Dated: June 8, 2022